

Hearing Date: August 9, 2017, 9:30 a.m. (Prevailing Eastern Time)

Proposed Objection Deadline: August 2, 2017, 4:00 p.m. (Prevailing Eastern Time)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board for
Puerto Rico,

as representative of

The Puerto Rico Electric Power Authority, *et al.*

Debtor.

PROMESA

Title III

No. 17 BK 04780-LTS

**NOTICE OF MOTION OF AD HOC GROUP OF PREPA BONDHOLDERS, NATIONAL
PUBLIC FINANCE GUARANTEE CORPORATION, ASSURED GUARANTY CORP.,
ASSURED GUARANTY MUNICIPAL CORP., AND SYNCORA GUARANTEE INC.
FOR RELIEF FROM THE AUTOMATIC STAY TO ALLOW MOVANTS TO
ENFORCE THEIR STATUTORY RIGHT TO HAVE A RECEIVER APPOINTED**

PLEASE TAKE NOTICE that on July 18, 2017, the Ad Hoc Group of PREPA Bondholders, National Public Finance Guarantee Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Syncora Guarantee Inc. (the “**Movants**”), filed a motion (the “**Motion**”) for Relief from the Automatic Stay to Allow Movants to Enforce Their Statutory Right to Have a Receiver Appointed [Dkt. No. 74].

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion (“**Objections**”) must be in writing, must conform to the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and the Order Establishing Case Management Procedures [Dkt. No. 11] (the “**Case Management Procedures**”), and must be filed with the Court (a) by registered users of the Court’s case filing system, electronically in accordance with Rule 5 of the Local Rules for the District of Puerto Rico (the “**Local District Court Rules**”), and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF), and served on (i) counsel for the Oversight Board, Proskauer Rose LLP, Eleven Times Square, New

York, New York 10036-8299 (Attn: Martin J. Bienenstock and Stephen L. Ratner), and O'Neill & Borges LLC, 250 Muñoz Rivera Ave., Suite 800, San Juan, PR 00918-1813 (Attn: Hermann D. Bauer, Esq.); (ii) the Puerto Rico Fiscal Agency and Financial Advisory Authority, Roberto Sánchez Vilella (Minillas) Government Center, De Diego Ave. Stop 22, San Juan, Puerto Rico 00907; (iii) counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority, O'Melveny & Myers LLP, 7 Times Square, New York, New York 10036 (Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq., and Diana M. Perez, Esq.), and Law Offices of Andrés W. López, Esq., 902 Fernández Juncos Ave., San Juan, PR 09007 (Attn: Andrés W. López, Esq.); (iv) the Office of the United States Trustee for Region 21, Edificio Ochoa, 500 Tanca Street, Suite 301, San Juan, PR 00901-1922; (v) Ad Hoc Group, Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Gregory Horowitz, Esq., Natan Hamerman, Esq., and Alice Byowitz, Esq.); (vi) counsel for National Public Finance Guarantee Corporation, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Jonathan Polkes, Esq., Marcia Goldstein, Esq., Salvatore A. Romanello, Esq., and Gregory Silbert, Esq.); (vii) counsel for Assured Guaranty Corp. and Assured Guaranty Municipal Corp., Cadwalader, Wickersham & Taft LLP, 200 Liberty Street, New York, New York 10281 (Attn: Howard R. Hawkins, Jr., Esq., Mark C. Ellenberg, Esq., Nathan Bull, Esq., Ellen M. Halstead, Esq., Thomas J. Curtin, Esq., and Casey J. Servais, Esq.); and (viii) counsel for Syncora Guarantee Inc., Debevoise & Plimpton LLP, 919 Third Avenue, New York, New York, 10022 (Attn: My Chi To, Esq., Craig A. Bruens, Esq., and Elie J. Worenklein, Esq.). Objections to the Motion must be filed with the Court and served **so as to be received no later than August 2, 2017 at 4:00 p.m. (Prevailing Eastern Time).**

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served in accordance with the Case Management Procedures, the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion shall be held before the Honorable Laura Taylor Swain, United States District Court Judge, in Room 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, Office 150, San Juan, Puerto Rico 00918-1767 (the “Court”), on **August 9, 2017 at 9:30 a.m. (Prevailing Eastern Time)**, or as soon thereafter as counsel may be heard, to consider the relief sought by the Movants in the Motion.

I hereby certify that, on this same date, I electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, today July 18, 2017.

**TORO, COLÓN, MULLET, RIVERA
& SIFRE, P.S.C.**

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